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**April 26, 2024** 

## Via Electronic Filing and E-Mail

Hon. Cathy Seibel
The Hon. Charles L. Brieant Jr. Federal Building and United States Courthouse
300 Quarropas Street
White Plains, NY 10601-4150
<chambersnysdseibel@nysd.uscourts.gov>

Re: Project Veritas, et al. v. James O'Keefe, et al., No. 7:23-cv-04533 Letter Motion to Reschedule Hearing

Dear Judge Seibel,

As Your Honor is aware, I represent Plaintiffs in the above-referenced matter. Pursuant to Your Honor's Individual Practices, § 1(E), I am writing to request an adjournment of the pre-motion conference scheduled for May 15, 2024 (ECF No. 42) with respect to the motion of Defendants James O'Keefe and Transparency 1, LLC d/b/a O'Keefe Media Group to compel arbitration (ECF Nos. 40 & 41), to May 23, 2024, to wit:

1) Original Date:

May 15, 2024

2) Number of Previous Requests for Adjournment of Conference:

None

3) Whether Previous Requests were Granted or Denied:

Not Applicable

4) Reason for the Instant Request:

Undersigned counsel is unavailable (both in-person and remotely) due to scheduled surgery for counsel's spouse. Other matters make May 23, 2024, the next best, closest date.

5) Whether the Adversary Consents:

Counsel for the moving defendants consents to the adjournment to May 23.

Thank you for your attention to this matter.

Respectfully submitted,

Jay M. Wolman

cc: Counsel of Record